

FILED
3/28/2022

EDP:CWE
F. #2021R00708

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

CINDY MOSCHILLO,

Defendant.

----- X

THE GRAND JURY CHARGES:

I N D I C T M E N T

1:22-cr-00131(MKB)(MMH)

Cr. No. _____
(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(B)(vi), 841(b)(1)(C), 846,
853(a) and 853(p); T. 18, U.S.C., §§ 2
and 3551 et seq.)

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl and Heroin)

1. On or about and between March 23, 2021 and July 14, 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CINDY MOSCHILLO, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propenamide ("fentanyl"), a Schedule II controlled substance; and (b) a substance containing heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of fentanyl involved in the conspiracy attributable to the defendant as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, was 40 grams or more of a substance containing fentanyl.

(Title 21, United States Code, Sections 846, 841(b)(1)(B)(vi) and 841(b)(1)(C);
Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

2. On or about and between March 23, 2021 and July 14, 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CINDY MOSCHILLO, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) 40 grams or more of a mixture or substance containing fentanyl, a Schedule II controlled substance, and (b) a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vi) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon her conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such offenses, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been comingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL


FOREPERSON


BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

CINDY MOSCHILLO,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(B)(vi) 841(b)(1)(C), 846, 853(a),
and 853(p); T. 18, U.S.C., §§ 2 and 3551 et seq.)

A true bill.

Deight Reid
Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Chand W. Edwards-Balfour, Assistant U.S. Attorney (718) 254-6238